

COOLEY LLP
 TIANA DEMAS*
 (tdemas@cooley.com)
 KEVIN T. CARLSON*
 (ktcarlson@cooley.com)
 MARIAH YOUNG*
 (mayoung@cooley.com)
 110 N. Wacker Drive, Suite 4200
 Chicago, IL 60606-1511
 Telephone: +1 312 881 6500
 Facsimile: +1 312 881 6598

KYLE C. WONG (224021)
 (kwong@cooley.com)
 KRISTINE A. FORDERER (278745)
 (kforderer@cooley.com)
 3 Embarcadero Center, 20th Floor
 San Francisco, California 94111-4004
 Telephone: +1 415 693 2000
 Facsimile: +1 415 693 2222

*Attorneys for Defendant and Cross-Claimant
 Roblox Corporation (*Admitted Pro Hac Vice)*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

ARACELY SOUCEK, *et al.*,

Plaintiffs,

v.

ROBLOX CORPORATION, SATOZUKI
 LIMITED B.V., STUDS ENTERTAINMENT
 LTD., and RBLXWILD ENTERTAINMENT
 LLC,

Defendants.

ROBLOX CORPORATION,

Cross-Claimant,

v.

SATOZUKI LIMITED B.V., RBLXWILD
 ENTERTAINMENT LLC, STUDS
 ENTERTAINMENT LTD., BASED PLATE
 STUDIO LLC and JOHN DOE #1,

Cross-Defendants.

COOLEY LLP
 ROBBY L.R. SALDAÑA (356226)
 (rsaldana@cooley.com)
 CAITLIN MUNLEY*
 (cmunley@cooley.com)
 1299 Pennsylvania Avenue, NW, Suite 700
 Washington, D.C. 20004-2400
 Telephone: +1 202 842 7800
 Facsimile: +1 202 842 7899

JESSICA L. TAYLOR (339572)
 (jtaylor@cooley.com)
 10265 Science Center Drive
 San Diego, California 92121-1117
 Telephone: +1 858 550 6000
 Facsimile: +1 858 550 6420

Case No. 3:23-cv-04146-VC

Judge: Hon. Vince Chhabria

**DECLARATION OF ROBBY L.R. SALDAÑA
 IN SUPPORT OF ROBLOX CORPORATION'S
 OPPOSITION TO BASED PLATE'S MOTION
 TO DISMISS THE CROSS-CLAIMS**

1 I, Robby L.R. Saldaña, hereby declare as follows:

2 1. I am an attorney licensed in the State of California and admitted to the bar of the
3 Northern District of California. I am special counsel with the law firm Cooley LLP and am counsel
4 for Defendant and Cross-Claimant Roblox Corporation (“Roblox”). I submit this declaration
5 containing jurisdictional facts in support of Roblox’s opposition (“Opposition”) to Cross-
6 Defendant Based Plate Studios LLC’s (“Based Plate”) motion to dismiss Roblox’s cross-claims
7 (“Cross-Claims”) for lack of personal jurisdiction. I make this declaration based on my personal
8 knowledge and/or review of documents and other material. If called as a witness, I could and would
9 testify competently to the matters stated herein.

10 2. I submit this Declaration to describe (a) my understanding of the creation and
11 operation of the Bloxflip.com website (“Bloxflip”), one of the websites at issue in this case, which
12 changed its domain name to Bflip.com in November 2024, (b) communications with Based Plate’s
13 counsel related to jurisdictional discovery, (c) my understanding of Bloxflip’s co-founders, and (d)
14 the supporting exhibits for Roblox’s Opposition.

15 **Bloxflip’s Creation and Operation**

16 1. I understand that Bloxflip was founded in or around 2022 by two individuals who
17 use the online monikers “Psy” and “Aris.”

18 2. The first archived record of the Bloxflip homepage available on the Wayback
19 Machine with graphics is dated February 5, 2022, as reflected in Exhibit A to this Declaration. At
20 the time, the Bloxflip homepage did not identify any owner or operator. The site included links to
21 a Twitter account and a Discord account. Bloxflip’s February 5, 2022 homepage contained a link
22 to the site’s “Terms of Service,” as reflected in Exhibit B. These terms similarly did not identify
23 any owner or operator. *Id.* Twitter (now known as X) was headquartered in San Francisco,
24 California until September 2024. *See* Sarah Emerson, *Elon Musk Has Officially Moved X to Texas*,
25 *Forbes* (Sept. 18, 2024), [https://www.forbes.com/sites/sarahemerson/2024/09/18/elon-musk-has-](https://www.forbes.com/sites/sarahemerson/2024/09/18/elon-musk-has-officially-moved-x-to-texas/)
26 [officially-moved-x-to-texas/](https://www.forbes.com/sites/sarahemerson/2024/09/18/elon-musk-has-officially-moved-x-to-texas/). Discord is headquartered in San Francisco, California. *See* Discord,
27 Discord Company Information, <https://discord.com/company-information>.

28 3. In the archived version of Bloxflip dated April 3, 2022, Bloxflip purported to allow

1 users to “buy ROBUX with Credit/Debit Cards and Paypal!,” as reflected in Exhibit C. Bloxflip
 2 announced that a “brand new partnership with Adurite.com allows you to instantly cash out your
 3 winnings into Roblox Limiteds.” *Id.* At this time, Bloxflip’s homepage still did not identify any
 4 owner or operator. The site also referenced a “new Discord.”

5 4. In the archived version of Bloxflip dated July 5, 2022, Bloxflip identified Defendant
 6 and Cross-Defendant Studs Entertainment Ltd. (“Studs”) as the owner and operator of Bloxflip, as
 7 reflected in Exhibit D. The Bloxflip homepage linked to Twitter and Discord channels.

8 5. The same archived version of Bloxflip dated July 5, 2022, linked to the Terms of
 9 Service (“July 2022 ToS”) reflected in Exhibit E. The July 2022 ToS described Bloxflip as “a skins
 10 betting service that allows users to play a variety of chance-based games (‘Games’) using Roblox
 11 skins (‘Limiteds’) and the virtual in-game currency used by players of Roblox (‘Robux’).” The
 12 July 2022 ToS provided for “exclusive jurisdiction and venue in, and only in, Orange County,
 13 Florida” for disputes related to the Terms of Service. The Terms of Service identified “Walter Law
 14 Group,” a law firm based in Orange County, Florida.

15 6. The archived version of Bloxflip dated July 25, 2022 shows that the site was
 16 undergoing a redesign, as reflected in Exhibit F to this Declaration. Bloxflip added new ways to
 17 reach its users, as reflected in said Exhibit. In particular, the homepage linked to a Twitch channel
 18 at the following URL: https://www.twitch.tv/bloxflip_official. Twitch is headquartered in San
 19 Francisco, California. *See* Twitch, Terms of Service, [https://www.twitch.tv/p/en/legal/terms-of-](https://www.twitch.tv/p/en/legal/terms-of-service/)
 20 [service/](https://www.twitch.tv/p/en/legal/terms-of-service/) (“The Twitch Services are offered by: Twitch Interactive, Inc., 350 Bush Street, 2nd Floor,
 21 San Francisco, CA 94104). Bloxflip also included a new heading for “Help,” which included a
 22 “Live support” option. The live support option linked to a Bloxflip Help Center. The Bloxflip
 23 Help Center was hosted by Intercom, as reflected in Exhibit G. Intercom is a company
 24 headquartered in San Francisco, California. *See* Intercom, Careers,
 25 [https://www.intercom.com/careers?](https://www.intercom.com/careers?redirect_from=/careers/san-francisco)
 26 [redirect_from=/careers/san-francisco](https://www.intercom.com/careers?redirect_from=/careers/san-francisco) (“San Francisco. The center of the tech universe, and our
 27 HQ.”).

28 7. A company called EthicalDevs based in Wyoming states that it has been responsible

1 for “revamping Bloxflip,” as reflected in Exhibit H. A case study published to EthicalDevs’s
 2 website describes the location of the project as “USA” and the project timeline as “Aug 2022 –
 3 present.” EthicalDev has provided “backend development” work to Bloxflip. EthicalDev’s
 4 homepage contains a “testimonial” from “Shane S., Co-founder, Bloxflip – USA,” as reflected in
 5 Exhibit I.

6 8. The archived version of the Bloxflip Help Center dated September 19, 2022
 7 contained a Help Center page titled “About BloxFlip,” attached as Exhibit J. The Help Center page
 8 stated: “We are a website for gamblingyour Robux.” Under the question “Is BloxFlip Illegal?”, the
 9 Help Center Page stated: “Using any 3rd party application there is a possibility of being banned but
 10 since there are no bots in between and everything is fully automated with P2P transactions, the odds
 11 are very low. Since we are using your cookie for this automation you will likely not encounter any
 12 suspicion from Roblox. Although there is a very slim chance I cannot guarantee there is no
 13 possibility of being banned. Generally you are very safe when using our website or any affiliated.”

14 9. The archived version of Bloxflip dated November 27, 2022 disclosed further
 15 information about Studs, as reflected in Exhibit K. Specifically, the homepage stated that “Bloxflip
 16 is a brand name of STUDS ENTERTAINMENT LTD, Reg No: HE 436022, Having it’s registered
 17 address at 7, Stasandrou, Flat/Office 101, Nicosia, 1060 Cyprus”.

18 10. The archived version of Bloxflip dated July 2, 2023 continued to list Studs as the
 19 owner and operator of Bloxflip, as reflected in Exhibit L. The Bloxflip homepage again reflected
 20 that “Bloxflip is a brand name of STUDS ENTERTAINMENT LTD, Reg No: HE 436022, Having
 21 it's registered address at 7, Stasandrou, Flat/Office 101, Nicosia, 1060 Cyprus.” The page also
 22 listed the following phone number for Studs: (+357) 232 32 032. I understand that the country
 23 code +357 is associated with Cyprus.

24 11. On or about August 1, 2023, BP Games US, Inc., was incorporated in Delaware, by
 25 Shane Selinger, as reflected in Exhibit M.

26 12. The archived version of Bloxflip dated August 5, 2023 identifies Bloxflip as a
 27 “brand name of Baseplate GAMES,” as reflected in Exhibit N to this Declaration.

28 13. On or about August 15, 2023, Plaintiffs filed the first complaint in this case, which

1 named Studs as a Defendant. Dkt. 1. Plaintiffs alleged that “Studs owns and operates ... Bloxflip.”
 2 *Id.* ¶33.

3 14. The archived version of Bloxflip dated August 31, 2023 reverted to displaying Studs
 4 as the website’s operator, as reflected in Exhibit O.

5 15. On or about January 26, 2024, Plaintiffs served Studs with the first complaint at the
 6 registered address for Studs in Cyprus. Dkt. 62.

7 16. The archived version of Bloxflip dated February 27, 2024 contained a Help Center
 8 page titled “How to Login,” attached as Exhibit P. This page explained that “In order for Bloxflip
 9 to operate correctly, we require access to your Roblox account.” The page also stated: “There are
 10 two ways you can sign into BloxFlip. By providing us with your Roblox credentials or security
 11 cookie.” The page included screenshots and instructions. The Bloxflip Help Center from the same
 12 date included another page titled “Free Robux,” attached as Exhibit Q. The page identified affiliates
 13 of Bloxflip where users could purportedly earn “free robux.” In response to the question “are these
 14 sites illegal as well?”, the page stated: “All websites that are third-party users of ROBLOX are
 15 classified against the Terms of Service. Termination and flagged accounts will not be under our
 16 responsibility, please use the website at your own risk and under your own authority.”

17 17. On March 11, 2024, Plaintiffs moved for entry of default against Studs. Dkt. 63.

18 18. The archived version of Bloxflip dated March 12, 2024 continued to identify Studs
 19 as the owner and operator of Bloxflip, as reflected in Exhibit R.

20 19. On or about March 13, 2024, Based Plate was incorporated as an LLC in St. Vincent
 21 and Grenadines (“SVG”), as reflected in the results of an entity search for Based Plate on the
 22 publicly accessible website for the Financial Services Authority of SVG, attached as Exhibit S.

23 20. On March 15, 2024, the Clerk of the Court entered a default against Studs. Dkt. 64.

24 21. On or about April 17, 2024, a YouTube user using the online moniker “RoZone”
 25 began to raise questions about whether Bloxflip was “about to exit scam.” *See RoZone, Is Bloxflip*
 26 *About to Exit Scam* (Apr. 17, 2024), <https://www.youtube.com/watch?v=MwlbmkJTcqA>. In the
 27 video, RoZone displayed a message posted to a Discord channel on March 31, 2024 stating that “it
 28 is time to link your Bloxflip account with your BloxGame account!” Thereafter, in his video,

1 RoZone showed a screenshot of the complaint filed in this case while noting that “in the lawsuit,
 2 the specific entity being sued is not Bloxflip the website, but rather the company that owns it which
 3 is Studs Entertainment Limited, so I directly asked the owners whether or not the move had
 4 anything to do with the lawsuit...” Thereafter, RoZone displayed a screenshot of a chat
 5 communication directed to “psy” and April 1, 2024. RoZone stated that he asked Psy whether the
 6 move to BloxGame had “anything to do with the 5 million dollar class action lawsuit which is
 7 currently against bloxflip?” RoZone also asked Psy “Is bloxgame owned by the same company as
 8 bloxflip (STUDS ENTERTAINMENT LTD). If not, why not?” RoZone stated that “the owner I
 9 contacted has so far refused to answer any of my questions.”

10 22. On May 5, 2024, RoZone posted another YouTube video concerning Bloxflip to
 11 discuss what he characterized as the response from Bloxflip to his April 17 video. *See* RoZone,
 12 Bloxflip LIED! (May 5, 2024), <https://www.youtube.com/watch?v=zF6lEqM-8uY>. In the video,
 13 RoZone showed a screenshot of a Discord chat dated March 30, 2024 from “RedVersa, the
 14 marketing director at Bloxflip.” In a screenshot of the chat, RoZone asked whether the move to
 15 BloxGame had “anything to do with the 5 million dollar class action lawsuit which is currently
 16 against bloxflip?” RedVersa responded: “So this would also be a question for psy, as I am only in
 17 the marketing team...” In the video, RoZone noted he “sent Psy a list of my questions and then
 18 waited over two weeks with no response before I posted the video,” *i.e.* the video titled “Is Bloxflip
 19 About to Exit Scam.” Later in his video, RoZone noted that papers related to the lawsuit had been
 20 “hand delivered” to Michael Chambers, an attorney for Studs, and that Studs had failed to respond.
 21 RoZone included a screenshot of a chat message from “Aris” dated April 18, 2024, stating: “Broski
 22 we’re a european company, in europe lawsuits don’t work like that.” RoZone included a second
 23 screenshot from “Aris” dated April 18, 2024, which stated “An American court, can not make a
 24 judgement on a european company.”

25 23. In archived versions of Bloxflip dated August 9, 2024 and thereafter, the Bloxflip
 26 homepage identified “Based Plate Studios LLC” as the site’s owner and operator, with a registered
 27 address of Suite 305, Griffith Corporate Centre, Beachmont, Kingstown, SVG, as reflected in
 28 Exhibit T. Based Plate had the same phone number as Studs: (+357) 232 32 032. The Bloxflip

1 homepage also contained hyperlinks to Discord, Twitch, and X.

2 24. The archived version of Bloxflip dated September 2, 2024 displayed an FAQ page,
3 as reflected in Exhibit U. In response to the question “1 – What is BloxFlip?”, the page displayed
4 the following response: “BloxFlip is the #1 social casino for wagering ROBUX! Deposit fiat,
5 crypto, ROBUX, and limiteds to receive a balance on the site to start playing! Cashout your
6 ROBUX into your account or choose from our large selection of Limiteds to cash out to as well.”
7 In response to the question “2 – Why do you need my password/cookie?”, the page displayed the
8 following response “This is needed so that you can deposit ROBUX from your account with your
9 onsite balance. We don’t hold your ROBUX when you deposit it, but rather we utilize a p2p system
10 for our withdraws which would not be possible without access to your account. It also makes it
11 more convenient and faster to receive your ROBUX and Limiteds from withdraws. We use state-
12 of-the-art encryption and security measures to store your cookie and we do not have access to your
13 password. With millions of ROBUX processed through our website every day, rest assured that
14 you will not need to worry.” The FAQ stated that Bloxflip “is registered under the company entity
15 ‘Based Plate Studios LLC’.”

16 25. The archived version of Bloxflip dated September 21, 2024 displayed a Terms of
17 Service, as reflected in Exhibit FF. In relevant part, the Terms included a subsection titled “F. FTC
18 Guidelines,” under Section 6. The document listed several requirements related to “affiliate and/or
19 ‘influencer’ marketing, including the Disclosures 101 for Social Media Influencers.”

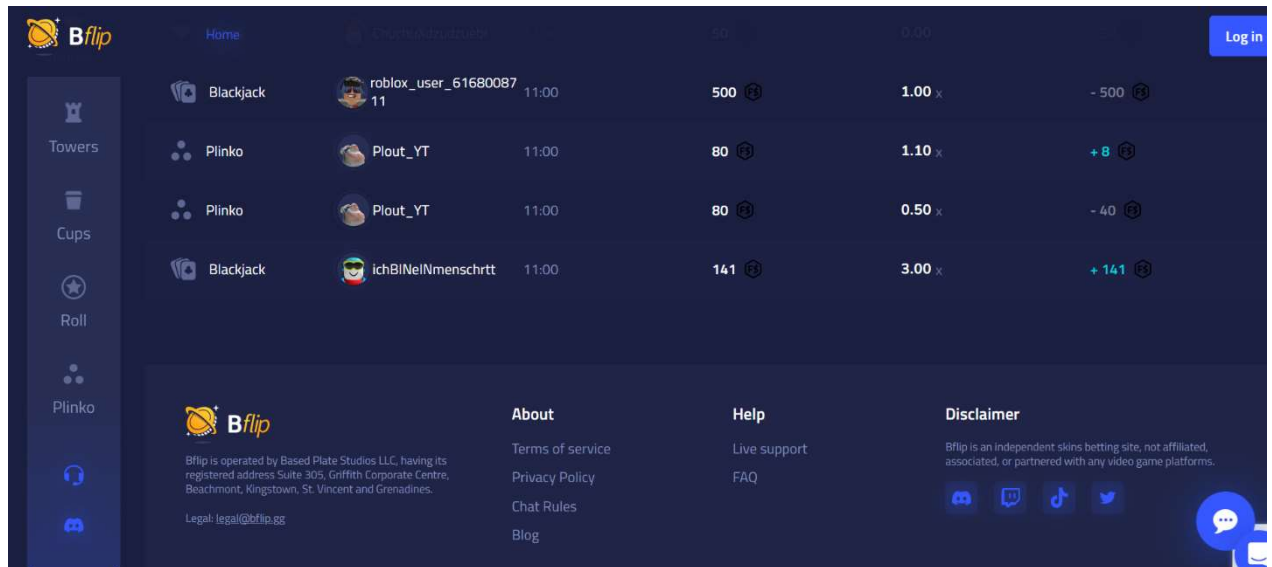
20 26. The archived version of Bloxflip dated September 21, 2024 displayed a Privacy
21 Policy, as reflected in Exhibit V. The Privacy Policy identified Studs as the entity that owned
22 Bloxflip, even though the footer of the website listed Based Plate. The Privacy Policy identified
23 “legal@bloxflip.com” as a method to contact Bloxflip. The Privacy Policy also contained a
24 dedicated section for California residents under the heading “12. Do California Residents Have
25 Specific Privacy Rights?” The Privacy Policy provided that “If you are a California resident and
26 would like to make such a request, please submit your request in writing to us using the contact
27 information provided below.” The Privacy Policy also provided detailed information about the
28 “categories of information” Bloxflip had collected in the past 12 months, in order to comply with

California law, including the California Consumer Protection Act (“CCPA”).

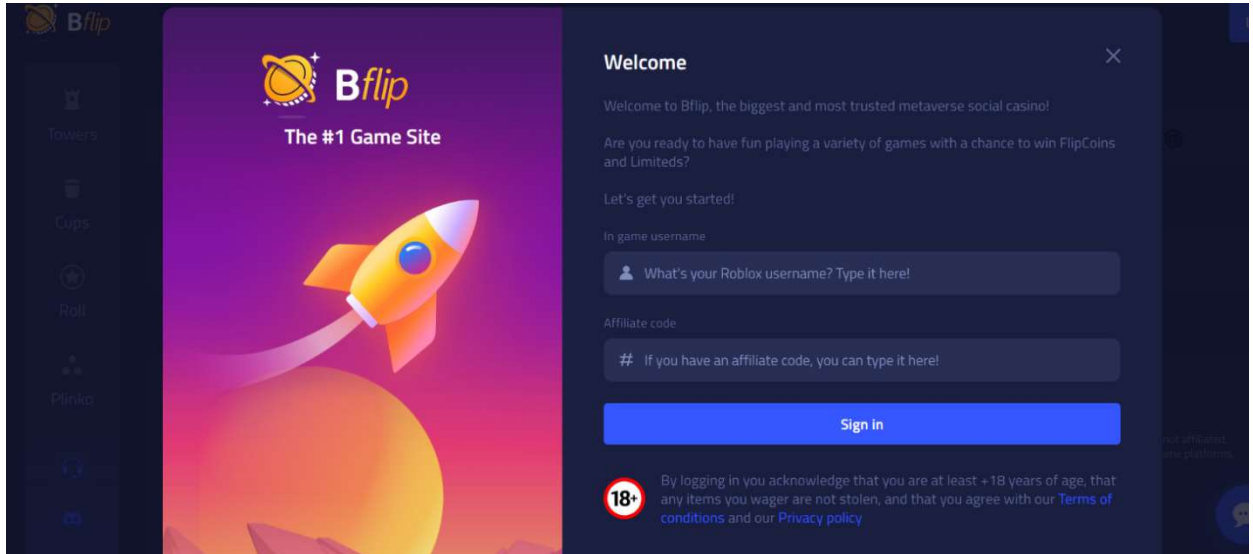
27. On November 14, 2024, my colleague sent a cease-and-desist (“C&D”) letter to Based Plate on Roblox’s behalf via email (legal@bloxflip.com and b38c19282a684c4cba7d1005972ba3e4.protect@withheldforprivacy.com) and by mailing a copy of the letter to Based Plate’s registered address in SVG. The C&D letter reiterated to Based Plate and its agents that their use of the Roblox Platform was unauthorized, required that they close any and all Roblox accounts that they were using, and required that they agree to never access Roblox’s services again. The C&D letter also required that Based Plate and its agents cease their illegitimate uses of Roblox’s trademarks on Bloxflip and in advertisements for Bloxflip.

28. Following the C&D letter, on November 16, 2024, I navigated to Bloxflip and took the below screenshots.

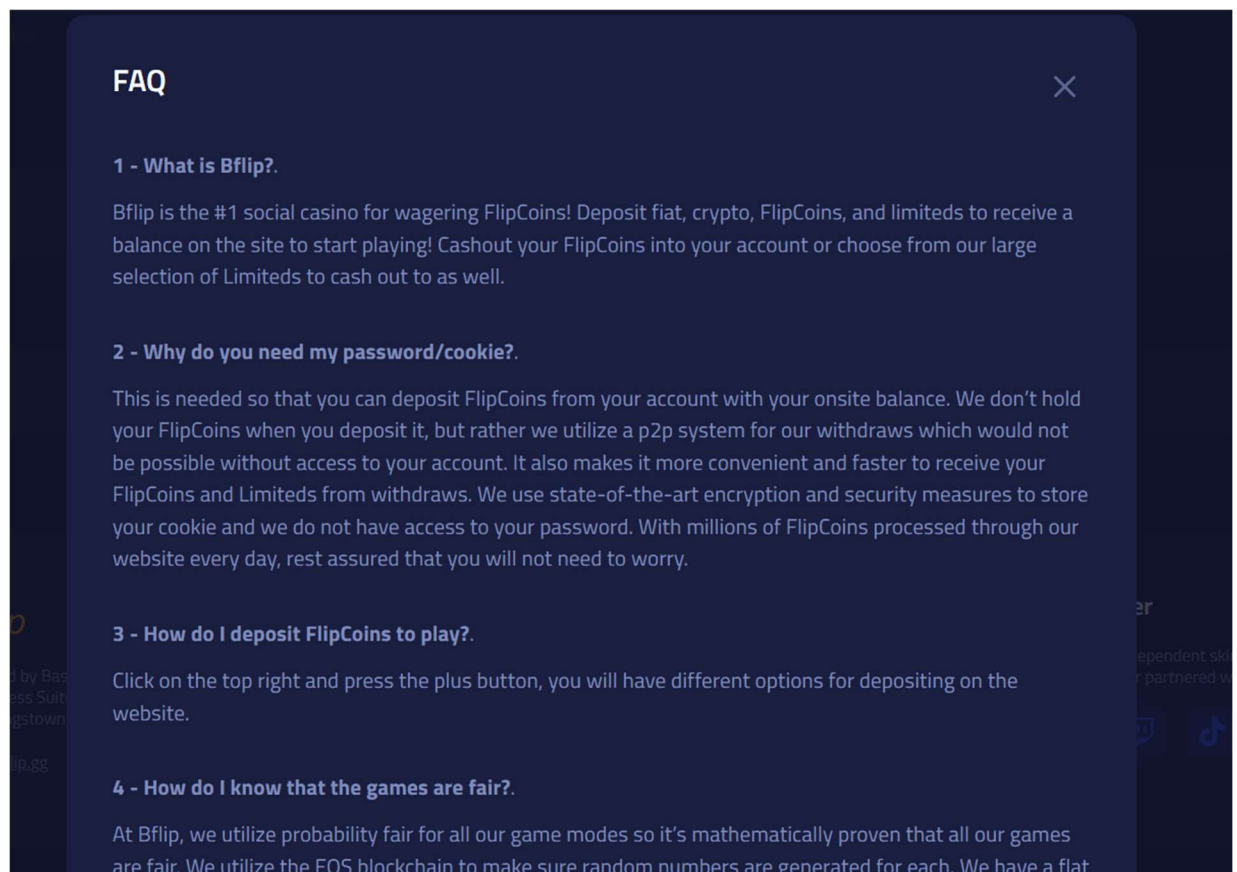
a. On the homepage, I noticed that Bloxflip had changed its display name to “Bflip”:



b. I noticed that the Bloxflip login page continued to request a Roblox username:



- c. I also noticed that Bloxflip changed its FAQ to replace references to “Robux” with “FlipCoins.” The FAQ described the same “need” for a “password/cookie” as Based Plate had described in its earlier version of the FAQ reflected in Exhibit U:



1 29. On November 17, 2024, Yasamin Parsafar, a partner in the San Francisco office of
2 the law firm Sheppard, Mullin, Richter & Hampton LLP (“Sheppard Mullin”) sent my colleague
3 an email concerning the C&D letter. Ms. Parsafar wrote: “We represent Based Plate Studios LLC
4 (Bloxflip.com) in various matters. We are in receipt of your letter dated November 14, 2024
5 regarding Roblox’s allegations related to its Terms of Use and trademarks. We are reviewing this
6 matter and will follow up as soon as we complete our review to work with you to try to resolve the
7 issues.”

8 30. On November 20, 2024, Roblox filed its amended answer and Cross-Claims. Dkt.
9 119. Roblox named Based Plate as a Cross-Defendant.

10 31. Between December 3 and December 5, 2024, my colleague attempted to
11 communicate with Ms. Parsafar multiple times about whether she could accept service of the cross-
12 claims and summons for Based Plate. On December 4, 2024, Ms. Parsafar sent an email stating, in
13 relevant part: “We have not been engaged to represent Based Plate in litigation and thus we are not
14 authorized to accept service on their behalf at this time.” On December 5, 2024, Ms. Parsafar
15 informed my colleague that her firm represented Based Plate in many other non-litigation matters.

16 32. On or about December 9, 2024, Ms. Parsafar informed my colleagues and me that
17 “Based Plate has decided to shut down its BloxFlip operations for business reasons.”

18 33. After receiving Ms. Parsafar’s email, a colleague of mine took a screenshot of the
19 Bloxflip homepage, as reflected in Exhibit W. The homepage displayed a post titled “Bflip Is
20 Shutting Down.” The shutdown message stated, in relevant part, that “Since the inception of BFlip,
21 we have always operated in strict compliance with all legal and regulatory guidelines. Recently,
22 however, the legal team representing ROBLOX has begun to apply pressure compelling us to cease
23 operations. Shutting down now gives us the opportunity and time to begin refunding our users
24 quickly and safely. Our team is committed to ensuring that any remaining FlipCoin balance can be
25 queued for a card refund, or a withdrawal. You can see the progress of all refunds on our site below,
26 as well as your position in the queue.”

27 34. By mid-2024, Roblox had developed and deployed bespoke signals to detect virtual
28 content transactions by Roblox users who may have used Bloxflip and to moderate the

1 corresponding Roblox accounts. My understanding of Roblox’s records is that at least 8,394 of the
 2 Roblox accounts moderated using these signals during the period between August 1, 2024 and
 3 December 31, 2024, had account sign-up Internet Protocol (“IP”) addresses that resolved to
 4 California. Based Plate was the owner and operator of Bloxflip during this period.

5 35. Bloxflip remains accessible, as reflected in Exhibit X.

6 36. At some point, Based Plate replaced the Bloxflip Privacy Policy reflected in Exhibit
 7 V with a different Privacy Policy for BloxGame (“BloxGame Privacy Policy”) but which is posted
 8 to Bloxflip. BloxGame is a different website. The BloxGame Privacy Policy is reflected in Exhibit
 9 Y. The corporate entity referenced in the BloxGame Privacy Policy is “Bazooki Studios Ltd. (doing
 10 business as BloxGame).”

11 37. Publicly accessible records show that Bloxflip uses Cloudflare, Inc. (“Cloudflare”) as a DNS provider, as reflected in Exhibit AA. Cloudflare is a San Francisco-based company. *See*
 12 Cloudflare, <https://www.cloudflare.com/website-terms/>. As reflected in Exhibits AA–DD, each
 13 one of the addresses listed in the DNS records resolves to an IP address located in San Francisco,
 14 California. Publicly accessible records also show that bflip.com (the URL to which Bloxflip
 15 redirects) uses content delivery network services provided by Cloudflare, as reflected in Exhibit
 16 EE.
 17 EE.

18 38. Roblox has repeatedly requested that Based Plate provide jurisdictional discovery if
 19 it would continue to dispute whether this Court has personal jurisdiction over it. I made requests
 20 for such discovery during a conferral with Based Plate’s counsel on March 6, 2025, and in an email
 21 dated March 7, 2025. To-date, Based Plate has not agreed to provide any jurisdictional discovery
 22 to Roblox.

23 **Bloxflip’s Co-Founders**

24 39. As discussed above, the co-founders of Bloxflip have used the online monikers
 25 “Psy” and “Aris.”

26 40. Based on my review of Roblox records, my understanding is that Roblox’s records
 27 show an email address with the name “Shane Selinger” associated with a Roblox account called
 28 “psyduckc”. I also understand that, since at least 2016, Roblox has repeatedly moderated accounts

1 associated with Mr. Selinger for violations of the Roblox Terms of Use. Roblox has also deleted
2 multiple Roblox accounts associated with Mr. Selinger.

3 41. Based on my review of Roblox records, my understanding is that Roblox has
4 moderated accounts associated with an individual named Aristeidis Stathouloupoulos located in
5 Greece for violations of the Roblox Terms of Use. Roblox has also deleted multiple Roblox
6 accounts associated with Mr. Stathouloupoulos. “Aris” is a shorthand for “Aristeidis.”

7 **Supporting Exhibits for Roblox’s Opposition**

8 42. **Exhibit A** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
9 homepage as of February 5, 2022, as displayed on the Wayback Machine at the following publicly
10 accessible URL: <https://web.archive.org/web/20220205020855/https://bloxflip.com/crash>. A colleague
11 obtained the PDF by visiting the Wayback Machine on March 20, 2025, searching for bloxflip.com,
12 clicking on an available capture from February 5, 2022, and printing the webpage to PDF.

13 43. **Exhibit B** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
14 Terms of Service on February 5, 2022, as displayed on the Wayback Machine at the following publicly
15 accessible URL: <https://web.archive.org/web/20220205020855/https://bloxflip.com/terms>. I obtained
16 the PDF by visiting the Wayback Machine on March 17, 2025, searching for bloxflip.com, clicking on
17 an available capture from February 5, 2022, clicking on “Terms of Services”, and printing the webpage
18 to PDF.

19 44. **Exhibit C** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
20 homepage as of April 3, 2022, as displayed in the Wayback Machine at the following publicly accessible
21 URL: <https://web.archive.org/web/20220403152859/bloxflip.com>. I obtained the PDF by visiting the
22 Wayback Machine on March 17, 2025, searching for bloxflip.com, clicking on an available capture
23 from April 3, 2022, and printing the webpage to PDF.

24 45. **Exhibit D** to this Declaration is a true and correct copy of a PDF showing a portion of
25 the Bloxflip homepage as of July 5, 2022, as displayed in the Wayback Machine at the following
26 publicly accessible URL: <https://web.archive.org/web/20220705071244/bloxflip.com>. A colleague of
27 mine obtained the PDF by visiting the Wayback Machine on March 21, 2025, searching for
28 bloxflip.com, clicking on an available capture from July 5, 2022, scrolling to render the footer visible,

1 capturing the resulting screen, and printing it to PDF.

2 46. **Exhibit E** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
3 Terms of Service as of July 5, 2022, as displayed in the Wayback Machine at the following publicly
4 accessible URL: <https://web.archive.org/web/20220705071244/https://bloxflip.com/terms>. I obtained
5 the PDF by visiting the Wayback Machine on March 17, 2025, searching for bloxflip.com, clicking on
6 an available capture from July 5, 2022, clicking on the Terms of Service, converting the page to printer-
7 friendly version after the content of the page would not render if I printed to PDF, and then printing the
8 printer-friendly version of the webpage to PDF.

9 47. **Exhibit F** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
10 homepage as of July 25, 2022, as displayed in the Wayback Machine at the following publicly
11 accessible URL: <https://web.archive.org/web/20220725212036/https://bloxflip.com/>. I obtained the
12 PDF by visiting the Wayback Machine on March 17, 2025, searching for bloxflip.com, clicking on an
13 available capture from July 25, 2022, and printing the webpage to PDF.

14 48. **Exhibit G** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
15 Help Center as of July 25, 2022, as displayed in the Wayback Machine at the following publicly
16 accessible URL: <https://web.archive.org/web/20220725212035/https://intercom.help/bloxflip/en/>. I
17 obtained the PDF by visiting the Wayback Machine on March 17, 2025, searching for bloxflip.com,
18 clicking on an available capture from July 25, 2022, clicking on “Live support” under “Help,” and
19 printing the webpage to PDF.

20 49. **Exhibit H** to this Declaration is a true and correct copy of a PDF showing a case study
21 webpage published by Ethical Devs at the following publicly accessible URL:
22 <https://ethicaldevs.tech/case-study-bloxflip/>. I obtained the PDF by visiting the webpage on March 16,
23 2025, and printing the webpage to PDF.

24 50. **Exhibit I** to this Declaration is a true and correct copy of a PDF of the homepage for
25 Ethical Devs at the following publicly accessible URL: <https://ethicaldevs.tech/>. I obtained the PDF by
26 visiting the webpage on March 19, 2025, and printing the webpage to PDF.

27 51. **Exhibit J** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
28 Help Center as of September 19, 2022 as displayed in the Wayback Machine at the following publicly

1 accessible URL: <https://web.archive.org/web/20220919041141/https://help.bloxflip.com/en/articles/6>
2 146360-about-bloxflip. I obtained the PDF by visiting the Wayback Machine on March 21, 2025,
3 searching for intercom.help/bloxflip.com/en, clicking on an available capture from September 19, 2022,
4 clicking “General Information,” clicking “About BloxFlip,” and printing the webpage to PDF.

5 52. **Exhibit K** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
6 homepage as of November 27, 2022, as displayed in the Wayback Machine at the following publicly
7 accessible URL: <https://web.archive.org/web/20221127193958/bloxflip.com>. I obtained the PDF by
8 visiting the Wayback Machine on March 17, 2025, searching for bloxflip.com, clicking on an available
9 capture from November 27, 2022 and printing the webpage to PDF.

10 53. **Exhibit L** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
11 homepage as of July 2, 2023, as displayed in the Wayback Machine at the following publicly accessible
12 URL: <https://web.archive.org/web/20230702062602/https://bloxflip.com/>. I obtained the PDF by
13 visiting the Wayback Machine on December 13, 2024, searching for bloxflip.com, clicking on an
14 available capture from July 2, 2023, and printing the webpage to PDF.

15 54. **Exhibit M** to this Declaration is a true and correct copy of the corporate formation
16 document for BP Games US, Inc, as received on March 10, 2025. I obtained this copy by requesting
17 on March 10, 2025, that a colleague with my firm order the corporate formation documents from the
18 Delaware Secretary of State through a vendor.

19 55. **Exhibit N** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
20 homepage as of August 5, 2023, as displayed in the Wayback Machine at the following publicly
21 accessible URL: <https://web.archive.org/web/20230805232305/https://bloxflip.com/>. I obtained the
22 PDF by visiting the Wayback Machine on December 12, 2024, searching for bloxflip.com, clicking on
23 an available capture from August 5, 2023, and printing the webpage to PDF.

24 56. **Exhibit O** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
25 homepage as of August 31, 2023, as displayed in the Wayback Machine at the following publicly
26 accessible URL: <https://web.archive.org/web/20230831024531/https://bloxflip.com/>. I obtained the
27 PDF by visiting the Wayback Machine on December 15, 2024, searching for bloxflip.com, clicking on
28 an available capture from August 31, 2023, and printing the webpage to PDF.

1 57. **Exhibit P** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
2 Help Center as of February 27, 2024, as displayed in the Wayback Machine at the following publicly
3 accessible URL: [https://web.archive.org/web/20240227190728/https://help.bloxflip.com/en/articles/6](https://web.archive.org/web/20240227190728/https://help.bloxflip.com/en/articles/6146154-how-to-login)
4 [146154-how-to-login](https://web.archive.org/web/20240227190728/https://help.bloxflip.com/en/articles/6146154-how-to-login). I obtained the PDF by visiting the Wayback Machine on March 8, 2025,
5 searching for intercom.help/bloxflip.com/en, clicking on an available capture from February 28, 2024,
6 clicking on “Account,” which caused the page to redirect to a capture dated February 27, 2024, clicking
7 “How to Login,” and printing the webpage to PDF.

8 58. **Exhibit Q** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
9 Help Center as of February 27, 2024, as displayed in the Wayback Machine at the following publicly
10 accessible URL: [https://web.archive.org/web/20240227192537/https://help.bloxflip.com/en/articles/61](https://web.archive.org/web/20240227192537/https://help.bloxflip.com/en/articles/6146655-free-robux)
11 [46655-free-robux](https://web.archive.org/web/20240227192537/https://help.bloxflip.com/en/articles/6146655-free-robux). I obtained the PDF by visiting the Wayback Machine on March 8, 2025, searching
12 for intercom.help/bloxflip.com/en, clicking on an available capture from February 28, 2024, clicking
13 “Giveaways,” which caused the page to redirect to a capture dated February 27, 2024, clicking “Free
14 Robux,” and printing the webpage to PDF.

15 59. **Exhibit R** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
16 homepage as of March 12, 2024, as displayed in the Wayback Machine at the following publicly
17 accessible URL: <https://web.archive.org/web/20240312211112/https://bloxflip.com/>. I obtained the
18 PDF by visiting the Wayback Machine on March 17, 2025, searching for bloxflip.com, clicking on an
19 available capture from March 12, 2024, and printing the webpage to PDF.

20 60. **Exhibit S** is a true and correct copy of a PDF showing the entity name search results
21 for “Based Plate” through the St. Vincent and the Grenadines Financial Service Authority, which
22 are publicly accessible at the following URL available: <https://svgfsa.com/company-name-search/>.
23 I obtained the PDF by visiting the URL on March 19, 2025, searching for “Based Plate” in the
24 search bar, and printing the webpage to PDF.

25 61. **Exhibit T** to this Declaration is a true and correct copy of a PDF showing the
26 Bloxflip homepage as of August 9, 2024, as displayed in the Wayback Machine at the following
27 publicly accessible URL: <https://web.archive.org/web/20240809032326/https://bloxflip.com/>. I
28 obtained the PDF by visiting the Wayback Machine on December 12, 2024, searching for

1 bloxflip.com, clicking on available capture from August 9, 2024, and printing the webpage to PDF.

2 62. **Exhibit U** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
3 FAQ webpage as of September 2, 2024, as displayed in the Wayback Machine at the following publicly
4 accessible URL: <https://web.archive.org/web/20240902055246/https://bloxflip.com/>. I obtained the
5 PDF by visiting the Wayback Machine on March 21, 2024, searching for bloxflip.com, clicking on an
6 available capture from September 2, 2024, clicking on “FAQ,” and printing the webpage to PDF.

7 63. **Exhibit V** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
8 Privacy Policy as of September 21, 2024, as displayed in the Wayback Machine at the following
9 publicly accessible URL: [https://web.archive.org/web/20240921152641/https://bloxflip.com/privacy-](https://web.archive.org/web/20240921152641/https://bloxflip.com/privacy-policy)
10 [policy](https://web.archive.org/web/20240921152641/https://bloxflip.com/privacy-policy). I obtained the PDF by visiting the Wayback Machine on March 21, 2025, searching for
11 bloxflip.com, clicking on an available capture from September 21, 2024, clicking on “Privacy Policy”,
12 and printing the webpage to PDF.

13 64. **Exhibit W** to this Declaration is a true and correct copy of a PDF showing the
14 Bloxflip homepage as of December 9, 2024. A colleague of mine obtained the PDF by visiting
15 bloxflip.com on December 9, 2024 and printing the webpage to PDF.

16 65. **Exhibit X** to this Declaration is a true and correct copy of a PDF showing the
17 Bloxflip homepage as of March 21, 2025. I obtained the PDF by visiting bloxflip.com on March
18 21, 2025 and printing the webpage to PDF.

19 66. **Exhibit Y** to this Declaration is a true and correct copy of a PDF showing the
20 Privacy Policy accessible on Bloxflip as of March 21, 2025. I obtained the PDF by visiting
21 bloxflip.com on March 21, 2025, clicking the “Login” button, clicking “Privacy Policy,” and
22 printing the webpage to PDF.

23 67. **Exhibit Z** to this Declaration is a true and correct copy of a PDF showing the results
24 of a Cloudflare URL scan at the following publicly accessible URL:
25 <https://radar.cloudflare.com/domains/domain/bloxflip.com>. I obtained the PDF by visiting
26 <https://radar.cloudflare.com/scan> on March 21, 2025, entering “bloxflip.com” into the URL
27 scanner, clicking on “DNS,” clicking “Domain Information,” and printing the webpage to PDF.

28 68. **Exhibit AA** to this Declaration is a true and correct copy of a PDF showing the

1 results of an IP address lookup at the following publicly accessible URL:
2 <https://whatismyipaddress.com/ip/104.18.30.95>. I obtained the PDF by visiting
3 <https://whatismyipaddress.com/ip-lookup> on March 21, 2025, entering “104.18.30.95” into the
4 search bar under “Look up IP Address Location,” and printing the webpage to PDF.

5 69. **Exhibit BB** to this Declaration is a true and correct copy of a PDF showing the
6 results of an IP address lookup at the following publicly accessible URL:
7 <https://whatismyipaddress.com/ip/104.18.31.95>. I obtained the PDF by visiting
8 <https://whatismyipaddress.com/ip-lookup> on March 21, 2025, entering “104.18.31.95” into the
9 search bar under “Look up IP Address Location,” and printing the webpage to PDF.

10 70. **Exhibit CC** to this Declaration is a true and correct copy of a PDF showing the
11 results of an IP address lookup at the following publicly accessible URL:
12 <https://whatismyipaddress.com/ip/2606:4700::6812:1e5f>. I obtained the PDF by visiting
13 <https://whatismyipaddress.com/ip-lookup> on March 21, 2025, entering “2606:4700::6812:1e5f”
14 into the search bar under “Look up IP Address Location,” and printing the webpage to PDF.

15 71. **Exhibit DD** to this Declaration is a true and correct copy of a PDF showing the
16 results of an IP address lookup at the following publicly accessible URL:
17 <https://whatismyipaddress.com/ip/2606:4700::6812:1f5f>. I obtained the PDF by visiting
18 <https://whatismyipaddress.com/ip-lookup> on March 21, 2025, entering “2606:4700::6812:1f5f”
19 into the search bar under “Look up IP Address Location,” and printing the webpage to PDF.

20 72. **Exhibit EE** to this Declaration is a true and correct copy of a PDF showing the
21 results of a Cloudflare URL scan at the following publicly accessible URL:
22 <https://radar.cloudflare.com/scan/0d8a39f1-a6c3-40ee-91d1-491824ce56eb/summary>. I obtained
23 the PDF by visiting <https://radar.cloudflare.com/scan> on March 21, 2025, entering “bloxflip.com” into
24 the URL scanner, and printing the webpage to PDF.

25 73. **Exhibit FF** to this Declaration is a true and correct copy of a PDF showing the Bloxflip
26 “Terms of Services” as of September 21, 2024, as displayed in the Wayback Machine at the following
27 publicly accessible URL: <https://web.archive.org/web/20240921152641/https://bloxflip.com/terms>. I
28 obtained the PDF by visiting the Wayback Machine on March 21, 2025, searching for bloxflip.com,

1 clicking on an available capture from September 21, 2024, clicking on “Terms of Service”, and printing
2 the webpage to PDF.

3 74. I declare that the foregoing is true and correct.

4 Executed this March 21, 2025 in Washington, D.C.

5
6 /s/ Robby L.R. Saldaña

7 Robby L.R. Saldaña
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28